

**UNITED STATES COURT OF APPEALS
FOR THE SIXTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,	:	
	:	
Petitioner,	:	
	:	
v.	:	No. 14-1669, et al.
	:	
PARK AVENUE INVESTMENT	:	Hon. Stephanie Dawkins
ADVISOR, LLC, HOTEL MANAGEMENT	:	Davis appointed as
ADVISORS-TROY, LLC, 5500	:	Special Master.
MANAGEMENT, LLC, QUANTUM	:	
HOTELS, LLC, METROPOLITAN	:	
LODGING, LLC, and WICK ROAD	:	
HOTEL MANAGEMENT, LLC,	:	
a Single-Integrated Enterprise, a Single	:	
Employer, and Alter Egos,	:	
	:	
Respondents,	:	
	:	
and	:	
	:	
REMO POLSELLI, and	:	
HANNA KARCHO,	:	
	:	
Individual Respondents.	:	

JOINT MOTION

To the Honorable Stephanie Dawkins Davis:

Petitioner National Labor Relations Board (the “Board”), by its Assistant General Counsel, and Respondents Park Avenue Investment Advisor, LLC, Hotel Management Advisors-Troy, LLC, 5500 Management, LLC, Quantum Hotels, LLC, Metropolitan Lodging, LLC, Wick Road Hotel Management, LLC, Remo

Polselli, and Hanna Karcho, by their counsel, hereby jointly move for your recommendation to the United States Court of Appeals for the Sixth Circuit that it approve the annexed Stipulation for Entry of Consent Order and enter the proposed Consent Order, also annexed, in settlement of the contempt case initiated by the Board.

PARK AVENUE INVESTMENT ADVISOR, LLC;
HOTEL MANAGEMENT ADVISORS-TROY, LLC;
5500 MANAGEMENT, LLC; QUANTUM
HOTELS, LLC; METROPOLITAN LODGING, LLC;
WICK ROAD HOTEL MANAGEMENT, LLC; REMO
POLSELLI; HANNA KARCHO

Date: 2/24/2018

/s/ Ethan R. Holtz

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NATIONAL LABOR RELATIONS BOARD

Date: 2/24/2018

/s/ William G. Mascioli

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